

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

V.

卷之三

CRIMINAL NO.: H-19-488-S1

**MARIBEL SANTANA-CERANO
ARACELI SANTANA
CARLOS JOEL HERNANDEZ
JONNY ANTONIO TALAVERA
Defendant.**

United States Courts
Southern District of Texas
FILED

OCT 23 2019

SUPERSEDING INDICTMENT

David J. Bradley, Clerk of Court

THE GRAND JURY CHARGES THAT:

COUNT ONE

(False Statement in Connection with the Purchase of a Firearm)

On or about April 28, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Glock, model 42, .380 caliber pistol; and

a Glock, model 42, .380 caliber pistol;

from Guns of Texas, Houston, Texas, a federally licensed firearms dealer, knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant

represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO

(False Statement in Connection with the Purchase of a Firearm)

On or about May 3, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Glock, model 42, .380 caliber pistol; and

a Smith and Wesson, model M&P 22 Compact, .22 caliber pistol;

from Guns of Texas, Houston, Texas, a federally licensed firearms dealer, knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT THREE

(False Statement in Connection with the Purchase of a Firearm)

On or about May 19, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Ruger, model AR-556, 5.56 mm rifle; and

a Ruger, model LCP, .380 caliber pistol;

from Carter's Shooting Center, Inc., Carter's Country #2, Katy, Texas, a federally licensed firearms dealer, knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FOUR

(False Statement in Connection with the Purchase of a Firearm)

On or about May 26, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section

921, to wit:

a Kel-Tec, model PMR30, .22 caliber pistol;

from Guns of Texas, Houston, Texas, a federally licensed firearms dealer, knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FIVE

(False Statement in Connection with the Purchase of a Firearm)

On or about May 29, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Ruger, model LCP, .380 caliber pistol;

a Walther, model P22, .22 caliber pistol; and

a Walther, model P22, .22 caliber pistol;

from Academy Store 12, Sugar Land, Texas, a federally licensed firearms dealer, knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the

lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT SIX

(False Statement in Connection with the Purchase of a Firearm)

On or about May 30, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Walther, model P22, .22 caliber pistol; and

a Walther, model P22, .22 caliber pistol;

from Academy Store 35, Houston, Texas, a federally licensed firearms dealer, knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT SEVEN

(False Statement in Connection with the Purchase of a Firearm)

On or about June 1, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Ruger, model LCP, .380 caliber pistol; and

a Beretta, model Pico, .380 caliber pistol;

from Academy Store 172, Houston, Texas, a federally licensed firearms dealer, knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT EIGHT

(False Statement in Connection with the Purchase of a Firearm)

On or about July 13, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section

921, to wit:

a Kel-Tec, model PMR30, .22 caliber pistol; and

a Ruger, model LCP II, .380 caliber pistol;

from Guns Unlimited USA, Katy, Texas, a federally licensed firearms dealer, knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT NINE

(False Statement in Connection with the Purchase of a Firearm)

On or about July 16, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Ruger, model LCP II, .380 caliber pistol;

from Academy Store 35, Houston, Texas, a federally licensed firearms dealer, knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant

represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TEN

(False Statement in Connection with the Purchase of a Firearm)

On or about July 21, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Beretta, model Pico, .380 caliber pistol;

a Walther, model P22, .22 caliber pistol; and

a Smith and Wesson, model M&P Shield, .380 caliber pistol;

from Guns Unlimited USA, Katy, Texas, a federally licensed firearms dealer, knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT ELEVEN

(False Statement in Connection with the Purchase of a Firearm)

On or about July 26, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

- a Ruger, model LCP II, .380 caliber pistol;
- a Walther, model PK380, .380 caliber pistol;
- a Walther, model P22, .22 caliber pistol; and
- a Smith and Wesson, model M&P Shield, .380 caliber pistol;

from Guns Unlimited USA, Katy, Texas, a federally licensed firearms dealer, knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWELVE

(False Statement in Connection with the Purchase of a Firearm)

On or about July 28, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Beretta, model Pico, .380 caliber pistol;

a Smith and Wesson, model M&P Shield, .380 caliber pistol; and

a Smith and Wesson, model M&P Shield, .380 caliber pistol;

from Guns Unlimited USA, Katy, Texas, a federally licensed firearms dealer, knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT THIRTEEN

(False Statement in Connection with the Purchase of a Firearm)

On or about May 30, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

ARACELI SANTANA

and

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Beretta, model Pico, .380 caliber pistol;

from Guns Unlimited USA, Katy, Texas, a federally licensed firearms dealer, **ARACELI SANTANA** knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to **ARACELI SANTANA** under chapter 44 of Title 18, in that **ARACELI SANTANA** represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2) and 2.

COUNT FOURTEEN

(False Statement in Connection with the Purchase of a Firearm)

On or about July 7, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

ARACELI SANTANA

and

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Sccy Industries, model CPX-2, 9 mm pistol;

from Academy Store 35, Houston, Texas, a federally licensed firearms dealer, **ARACELI SANTANA** knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to **ARACELI SANTANA** under chapter 44 of Title 18, in that **ARACELI SANTANA** represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2) and 2.

COUNT FIFTEEN

(False Statement in Connection with the Purchase of a Firearm)

On or about July 14, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

ARACELI SANTANA

and

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Walther, model PK380, .380 caliber pistol;

from Guns Unlimited USA, Katy, Texas, a federally licensed firearms dealer, **ARACELI SANTANA** knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to **ARACELI SANTANA** under chapter 44 of Title 18, in that **ARACELI SANTANA** represented on the Form 4473 that she was

the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2) and 2.

COUNT SIXTEEN

(False Statement in Connection with the Purchase of a Firearm)

On or about July 16, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

ARACELI SANTANA

and

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Ruger, model LCPII, .380 caliber pistol;

from Academy Store 35, Houston, Texas, a federally licensed firearms dealer, **ARACELI SANTANA** knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to **ARACELI SANTANA** under chapter 44 of Title 18, in that **ARACELI SANTANA** represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2) and 2.

COUNT SEVENTEEN

(False Statement in Connection with the Purchase of a Firearm)

On or about July 21, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

ARACELI SANTANA

and

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Beretta, model Pico, .380 caliber pistol;

a Walther, model P22, .22 caliber pistol; and

a Walther, model PK380, .380 caliber pistol;

from Guns Unlimited USA, Katy, Texas, a federally licensed firearms dealer, **ARACELI SANTANA** knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to **ARACELI SANTANA** under chapter 44 of Title 18, in that **ARACELI SANTANA** represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2) and 2.

COUNT EIGHTEEN

(False Statement in Connection with the Purchase of a Firearm)

On or about July 26, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

ARACELI SANTANA

and

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Walther, model PK380, .380 caliber pistol;

a Smith and Wesson, model M&P Shield, .380 caliber pistol; and

a Smith and Wesson, model M&P Shield, .380 caliber pistol;

from Guns Unlimited USA, Katy, Texas, a federally licensed firearms dealer, **ARACELI SANTANA** knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to **ARACELI SANTANA** under chapter 44 of Title 18, in that **ARACELI SANTANA** represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2).

COUNT NINETEEN

(False Statement in Connection with the Purchase of a Firearm)

On or about July 28, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

ARACELI SANTANA

and

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Walther, model P22, .22 caliber pistol; and

a Beretta, model Pico, .380 caliber pistol;

from Guns Unlimited USA, Katy, Texas, a federally licensed firearms dealer, **ARACELI SANTANA** knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to **ARACELI SANTANA** under chapter 44 of Title 18, in that **ARACELI SANTANA** represented on the Form 4473 that she was the actual purchaser of the firearm, when in truth and in fact she was not.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2) and 2.

COUNT TWENTY

(False Statement in Connection with the Purchase of a Firearm)

On or about July 9, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

CARLOS JOEL HERNANDEZ

and

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Glock, model 42, .380 caliber pistol;

a Glock, model 42, .380 caliber pistol;

a Walther, model P22, .22 caliber pistol; and

a Walther, model P22, .22 caliber pistol;

from Academy Store 7, Houston, Texas, a federally licensed firearms dealer, **CARLOS JOEL HERNANDEZ** knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to **CARLOS JOEL HERNANDEZ** under chapter 44 of Title 18, in that **CARLOS JOEL HERNANDEZ** represented on the Form 4473 that he was the actual purchaser of the firearm, when in truth and in fact he was not.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2) and 2.

COUNT TWENTY-ONE

(False Statement in Connection with the Purchase of a Firearm)

On or about July 9, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

CARLOS JOEL HERNANDEZ

and

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Glock, model 42, .380 caliber pistol;

a Glock, model 42, .380 caliber pistol; and

a Smith and Wesson, model Bodyguard 380, .380 caliber pistol;

from Academy Store 35, Houston, Texas, a federally licensed firearms dealer, **CARLOS JOEL HERNANDEZ** knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to **CARLOS JOEL HERNANDEZ** under chapter 44 of Title 18, in that **CARLOS JOEL HERNANDEZ** represented on the Form 4473 that he was the actual purchaser of the firearm, when in truth and in fact he was not.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2) and 2.

COUNT TWENTY-TWO

(False Statement in Connection with the Purchase of a Firearm)

On or about July 9, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

CARLOS JOEL HERNANDEZ

and

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Walther, model P22, .22 caliber pistol;

a Walther, model P22, .22 caliber pistol;

a Ruger, model SR22, .22 caliber pistol; and

a Ruger, model SR22, .22 caliber pistol;

from Academy Store 172, Houston, Texas, a federally licensed firearms dealer, **CARLOS JOEL HERNANDEZ** knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to **CARLOS JOEL HERNANDEZ** under chapter 44 of Title 18, in that **CARLOS JOEL HERNANDEZ** represented on the Form 4473 that he was the actual purchaser of the firearm, when in truth and in fact he was not.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2) and 2.

COUNT TWENTY-THREE

(False Statement in Connection with the Purchase of a Firearm)

On or about July 10, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

CARLOS JOEL HERNANDEZ

and

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Smith and Wesson, model M&P Shield, .380 caliber pistol;

a Smith and Wesson, model M&P Shield, .380 caliber pistol;

a Ruger, model SR22, .22 caliber pistol; and

a Glock, model 42, .380 caliber pistol;

from Academy Store 10, Houston, Texas, a federally licensed firearms dealer, **CARLOS JOEL HERNANDEZ** knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to **CARLOS JOEL HERNANDEZ** under chapter 44 of Title 18, in that **CARLOS JOEL HERNANDEZ** represented on the Form 4473 that he was the actual purchaser of the firearm, when in truth and in fact he was not.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2) and 2.

COUNT TWENTY-FOUR

(False Statement in Connection with the Purchase of a Firearm)

On or about July 16, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

CARLOS JOEL HERNANDEZ

and

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Glock, model 42, .380 caliber pistol;

a Ruger, model LCP II, .380 caliber pistol; and

a Ruger, model SR22, .22 caliber pistol;

from Academy Store 116, Houston, Texas, a federally licensed firearms dealer, **CARLOS JOEL HERNANDEZ** knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to **CARLOS JOEL HERNANDEZ** under chapter 44 of Title 18, in that **CARLOS JOEL HERNANDEZ** represented on the Form 4473 that he was the actual purchaser of the firearm, when in truth and in fact he was not.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2) and 2.

COUNT TWENTY-FIVE

(False Statement in Connection with the Purchase of a Firearm)

On or about July 24, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

CARLOS JOEL HERNANDEZ

and

MARIBEL SANTANA-CERANO,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Smith and Wesson, model M&P Shield, .380 caliber pistol;

a Glock, model 42, .380 caliber pistol; and

a Glock, model 42, .380 caliber pistol;

from Academy Store 7, Houston, Texas, a federally licensed firearms dealer, **CARLOS JOEL HERNANDEZ** knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to **CARLOS JOEL HERNANDEZ** under chapter 44 of Title 18, in that **CARLOS JOEL HERNANDEZ** represented on the Form 4473 that he was the actual purchaser of the firearm, when in truth and in fact he was not.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2) and 2.

COUNT TWENTY-SIX

(False Statement in Connection with the Purchase of a Firearm)

On or about July 23, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

JONNY ANTONIO TALAVERA,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Glock, model 42, .380 caliber pistol;

a Glock, model 42, .380 caliber pistol;

a Walther, model P22, .22 caliber pistol; and

a Walther, model P22, .22 caliber pistol;

from Academy Store 13, Houston, Texas, a federally licensed firearms dealer, knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented on the Form 4473 that he was the actual purchaser of the firearm, when in truth and in fact he was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWENTY-SEVEN

(False Statement in Connection with the Purchase of a Firearm)

On or about July 23, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

JONNY ANTONIO TALAVERA,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Glock, model 42, .380 caliber pistol;

a Smith and Wesson, model M&P Shield, .380 caliber pistol; and

a Walther, model P22, .22 caliber pistol;

from Academy Store 16, Houston, Texas, a federally licensed firearms dealer, knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented on the Form 4473 that he was the actual purchaser of the firearm, when in truth and in fact he was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWENTY-EIGHT

(False Statement in Connection with the Purchase of a Firearm)

On or about July 23, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

JONNY ANTONIO TALAVERA,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Glock, model 42, .380 caliber pistol; and

a Smith and Wesson, model M&P Shield, .380 caliber pistol;

from Academy Store 19, Houston, Texas, a federally licensed firearms dealer, knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented on the Form 4473 that he was the actual purchaser of the firearm, when in truth and in fact he was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWENTY-NINE

(False Statement in Connection with the Purchase of a Firearm)

On or about July 25, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

JONNY ANTONIO TALAVERA,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

a Glock, model 42, .380 caliber pistol;

a Smith and Wesson, model M&P Shield, .380 caliber pistol; and

a Walther, model P22, .22 caliber pistol;

from Academy Store 116, Houston, Texas, a federally licensed firearms dealer, knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented on the Form 4473 that he was the actual purchaser of the firearm, when in truth and in fact he was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

A TRUE BILL

ORIGINAL SIGNATURE ON FILE

FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK
United States Attorney
Southern District of Texas


STEVEN T. SCHAMMEL
Assistant United States Attorney